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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

Amanda Davis, individually
and on behalf of all others similarly situated,

Plaintiff,

v.

KeyBank N.A.; and KeyBank Trust d/b/a
American Education Services LLC. d/b/a
KeyCorp Student Loan Trust,

Defendants.

Case No.: 2:22-cv-01645-JAD-EJY

**STIPULATION TO EXTEND
DEADLINE TO FILE REPLY TO
PLAINTIFF'S RESPONSE IN
OPPOSITION TO KEY'S MOTION
TO STAY DISCOVERY**

(First Request)

STIPULATION

Plaintiff Amanda Davis, Defendant American Education Services LLC (“**AES**”) and Defendant KeyBank N.A. (“**Key**”), by and through their undersigned counsel, hereby stipulate and agree to extend the deadline for Defendants to file a Reply to Plaintiff’s Response in Opposition to KeyBank N.A.’s Motion to Stay Discovery (“**Plaintiff’s Opposition**”) (ECF No. 41), which was filed on January 17, 2023. Key filed its Motion to Stay Discovery (ECF No. 34) on January 3, 2023. AES filed a Joinder to Key’s Motion to Stay Discovery (ECF No. 38) on January 13, 2023. The deadline to file Replies to Plaintiff’s Opposition is presently January 24, 2023 (the “**Reply Deadline**”). Due to Key’s counsel’s availability and schedule, the Parties have stipulated to extend the Reply Deadline to January 31, 2023 (7 days). No previous extensions have been sought or granted.

This is the first requested extension by Defendants. Defendants seek this extension due to the recent departure of Mr. Stein from the law firm of Thompson Hine, and is not made for purposes of delay. Defendants do not anticipate that any additional extension will be required.

DATED: January 20, 2023

1 BENNETT TUELLER JOHNSON & DEERE

FREEDOM LAW FIRM

2 /s/ Jared Inouye

/s/ George Haines

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10 *Attorneys for AES*

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12 **ORDER**

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14 IT IS SO ORDERED.

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17 UNITED STATES MAGISTRATE JUDGE

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19 DATED: January 20, 2023